

## **EXHIBIT 2**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JENNIFER B. CAMPBELL, :  
: Plaintiff, :  
: :  
v. : Civil Action No.: 12-1769 (RC)  
: :  
DISTRICT OF COLUMBIA, *et al.*, :  
: Defendants. :  
:

**VERDICT FORM**

**THE JURY MUST UNANIMOUSLY AGREE ON THE ANSWERS TO ALL OF THE QUESTIONS. THE COMPLETED VERDICT FORM MUST BE SIGNED AND DATED BY EACH JUROR.**

**1. 42 U.S.C. § 1983 and Fifth Amendment Procedural Due Process:  
Deprivation of Liberty Interest**

*a. “Reputation-Plus”*

A. Did Dr. Campbell prove by a preponderance of the evidence that the District made a false and defamatory statement concerning her?

Yes \_\_\_\_\_

No \_\_\_\_\_

If your answer is “Yes,” go on to the next question. If your answer is “No,” skip to the question about “Stigma or Disability” on the next page (Question 1.b).

B. Did Dr. Campbell prove by a preponderance of the evidence that the District published the false and defamatory statement, **without privilege**, to a third party?

Yes \_\_\_\_\_

No \_\_\_\_\_

If your answer is “Yes,” go on to the next question. If your answer is “No,” skip to the question about “Stigma or Disability” on the next page (Question 1.b).

C. Did Dr. Campbell prove by a preponderance of the evidence that the District's fault in publishing the false and defamatory statement amounted to at least negligence?

Yes \_\_\_\_\_

No \_\_\_\_\_

If your answer is "Yes," go on to the next question. If your answer is "No," skip to the question about "Stigma or Disability" below (Question 1.b).

**D. Did Dr. Campbell prove by a preponderance of the evidence that the publication of the false and defamatory statement caused her special harm?**

Yes \_\_\_\_\_

No \_\_\_\_\_

Regardless of your answer, go on to the question about "Stigma or Disability" below (Question 1.b).

*b. "Stigma or Disability"*

**Did Dr. Campbell prove by a preponderance of the evidence that the District's release of emails to the press and termination of her employment left a stigma on her and had the broad effect of largely precluding her from pursuing her chosen career?**

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answered "Yes" to this question, *or* if you answered "Yes" to *all* of the questions in the "Reputation-Plus" section, go on to the next question.

If you answered "No" to this question *and* you also answered "No" to *any* of the questions in the "Reputation-Plus" section, then your deliberations are over. Please sign this form on the next page so the foreperson can return it to the Court.

**2. 42 U.S.C. § 1983 and Fifth Amendment Procedural Due Process:  
Lack of Sufficient Process**

Did Dr. Campbell prove by a preponderance of the evidence that the District deprived her of her constitutionally protected liberty interest without due process?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answered "Yes" to this question, go on to the next question.

If you answered "No" to this question, then your deliberations are over. Please sign this form on the next page so the foreperson can return it to the Court.

### **3. Compensatory Damages**

What amount of compensatory damages, if any, did Dr. Campbell prove by a preponderance of the evidence that she suffered as a result of the District's violation of her right to due process?

\$ \_\_\_\_\_

UNANIMOUSLY AGREED TO THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2015.

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